

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

B.P. a minor, by and through their parent,
L.P.; C.L. a minor, by and through their
parent, K.L.; O.D. a minor, by and through
their parent; N.D., R.J. a minor, by and
through their parent, H.J.; L.H. a minor, by
and through their parent, S.H.; O.P. a minor,
by and through their parent, S.P.; E.H. a
minor, by and through their parent, M.H.; L.S.
a minor, by and through their parent, B.P.;
G.E. a minor, by and through their parent,
A.E.; M.B. a minor, by and through their
parent, R.B.; and G.A. a minor, by and
through their parent, A.A., each a minor
resident of the North Allegheny School
District attending a North Allegheny School
District School or a parent of the same,

Civ. No. 21-

Plaintiffs,

v.

NORTH ALLEGHENY SCHOOL
DISTRICT, a Pennsylvania governmental
entity, ANDREW CHOMOS, MARCIE
CROW, ELIZABETH BLACKBURN,
RICHARD MCCLURE, SCOTT E.
RUSSELL, ALLYSON MINTON, KEVIN
MAHLER, ELIZABETH WERNER,
and SHANNON YEAKEL, all individual
elected officials sued in their individual
capacity and in their capacity as members of
the NORTH ALLEGHENY SCHOLL
DISTRICT BOARD OF DIRECTORS, a
Pennsylvania elected legislative body,

Defendants.

**MOTION FOR 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING
THE SCHOOL BOARD OF THE NORTH ALLEGHENY SCHOOL DISTRICT AND
THE BOARD MEMEBRS; 3) ORDER TO SHOW CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT ISSUE; AND
4) ORDER AUTHORIZING EXPEDITED DISCOVERY**

AND NOW come above-named Plaintiffs, by and through their counsel Alexander W. Saksen and the law firm of Goldberg Kamin & Garvin, LLP and move this Court for an Order granting their *Ex Parte* Application for: 1) a temporary restraining order; 2) an order restraining the School Board of the North Allegheny School District; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants to the Complaint and attached hereto. The legal and factual support for this motion is contained in the accompanying Memorandum of Law. A proposed order is filed herewith.

Respectfully submitted,

GOLDBERG, KAMIN, AND GARVIN

/s/Alexander W. Saksen

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Brief was served by e-mail on this 22nd day of August 2021, addressed to the below parties and counsel:

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